

# SMITH & KING LLC

[www.SmithandKinglaw.com](http://www.SmithandKinglaw.com)

**LONG ISLAND OFFICE:**  
666 OLD COUNTRY ROAD  
SUITE 305  
GARDEN CITY, N.Y. 11530  
Telephone: (516) 213-0018  
Fax: (917) 591-3244

**NEW YORK CITY OFFICE:**\*  
900 THIRD AVENUE, 13<sup>TH</sup> FLOOR  
NEW YORK, N.Y. 10022  
Telephone: (212) 681-2800  
Fax: (917) 591-3244

\*Please send all mail to the Garden City Office

David S. Smith, Esq.<sup>†</sup>  
Brian King, Esq. (1978-2021)  
<sup>†</sup>Admitted in New York and California

March 6, 2025

**Via ECF**  
Honorable Allyne Ross  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, N.Y. 11201

Re:     United States v. Feng Jiang  
24-CR-264

Your Honor,

I represent defendant Feng Jiang in the above-referenced matter. I write to respectfully request permission for Mr. Jiang to travel for one night to St. Louis, MO this coming Sunday, March 9, 2025. Mr. Jiang is in full compliance with the terms of his bond and with his pre-trial services conditions.

Specifically, Mr. Jiang requests permission to travel on March 9, 2025, via Delta Airlines to St. Louis, MO, and return to New York the following day, March 10, 2025. Mr. Jiang will spend the night at the Hyatt located at 3154 Chestnut Street, St. Louis. The purpose of this trip is to look at a potential location to open a Tofu and BBQ restaurant.

Mr. Jiang and I have communicated this request and its details to PTS Officer Kadian Hammond, who does not object to it and will be provided with Mr. Jiang's full itinerary if this request is granted. I have also spoken with AUSA Patrick Campbell and he does not object to it.

Respectfully submitted,



David Scott Smith, Esq.

Cc:     AUSA Patrick Campbell (via ECF)  
PTS Officer Hammond (via email)